

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON

In re: Bruce D Goodman  
Lisa M. Reynolds

CASE NO.: 15 33610  
Chapter 13  
Judge Humphrey

---

**MOTION FOR MODIFICATION OF PLAN POST CONFIRMATION AND NOTICE**

---

The Debtor(s) hereby move the Court for an Approval to modify the Chapter 13 Plan. Support for the motion is set forth in the following memorandum.

**MEMORANDUM IN SUPPORT**

A plan has been confirmed.

Date petition filed: 11/04/2015

Date of last modification: N/A

Date plan confirmed: 07/14/2016

Date last modification approved: 07/18/2016

Monthly Plan Payments:

Current: \$775.00

Proposed: \$775.00

If the plan changes the monthly payments, amended Schedules I and J are attached.

Percent to Unsecured Creditors:

Current: 0%

Proposed: 0 %

Length of Plan (months): Current: 60 months

Proposed: 60 months

(Above median income case must be a 60 month plan unless plan is repaying 100% to the general unsecured creditors.)

**The effective date is the date of the entry of the Approval.** For calculation purpose, the Trustee will use the motion filed date.

The Debtor(s) are responsible for any increase in the Payroll Deduction, TFS, or Direct Payment until such payment is adjusted.

Reason for the modification, including any changes in circumstances since last plan: **ALLOW ADDITIONAL TWELVE (12) MONTHS TO SELL REAL ESTATE. PROPERTY IS AND HAS BEEN ON THE MARKET.**

Debtor's attorney will make separate application for additional attorney fees as provided by LBR 2016-1.

/s/ Richard P. Arthur  
Attorney for Debtor(s)

X BRUCE D GOODMAN

X KARIN L GOODMAN

**MODIFICATION OF CHAPTER 13 PLAN**

Page \_\_\_\_\_ of \_\_\_\_\_

Debtor (last name) GOODMAN

Case no. 15 33610

[List only creditors affected by modification]

---

Creditor name:

Type of Claim: ( ) secured ( ) unsecured ( ) 507 priority ( ) other

Nature of Claim: MORTGAGE

Current Plan:

Proposed Plan:

---

Creditor name:

Type of Claim: ( ) secured ( ) unsecured ( ) 507 priority ( ) other

Nature of Claim:

Current Plan:

Proposed Plan:

---

Creditor name:

Type of Claim: ( ) secured ( ) unsecured ( ) 507 priority ( ) other

Nature of Claim:

Current Plan:

Proposed Plan:

---

Creditor name:

Type of Claim: ( ) secured ( ) unsecured ( ) 507 priority ( ) other

Nature of Claim:

Current Plan:

Proposed Plan:

(CASE NUMBER)

## NOTICE OF MOTION FOR MODIFICATION OF PLAN POST CONFIRMATION

The Debtor(s) has filed a Motion for Modification of Plan Post Confirmation.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in the Motion, then on or before **twenty –one (21) days from the date set forth in the certificate of service for the motion**, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to Clerk, U.S. Bankruptcy Court, Southern District of Ohio, 120 W. Third St., Dayton, Ohio 45402 OR your attorney must file a response using the court's ECF System.

The court must receive your response on or before the above date.

You must also send a copy of your response either by 1) the court's ECF system or by 2) regular U.S. Mail to:

Bruce D Goodman, 3741 Marshall Road Kettering OH 45429  
Karin D Goodman, 151 Taylors Trace, Albany KY 42602  
Richard P. Arthur 1634 S. Smithville Road Dayton OH 45410  
Jeffrey M. Kellner, Chapter 13 Trustee, 131 N. Ludlow St., Dayton, Ohio 45402  
Office of the U.S. Trustee, 170 North High St., Suite 200, Columbus, Oh 43215

If you or your attorney do not takes these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief without further hearing or notice.

## CERTIFICATE OF SERVICE

I hereby certify that on \_\_\_\_\_ a copy of the attached was served on the following ECF participants electronically through the court's ECF System at the email address registered with the court.

Richard P. Arthur 1634 S. Smithville Road Dayton OH 45410  
Jeffrey M. Kellner, Chapter 13 Trustee, 131 N. Ludlow St., Dayton, Ohio 45402  
Office of the U.S. Trustee, 170 North High St., Suite 200, Columbus, Oh 43215

And on the following by ordinary U.S. Mail, on (date):  
Bruce D Goodman, 3741 Marshall Road Kettering OH 45429  
Karin D Goodman, 151 Taylors Trace, Albany KY 42602  
All creditors attached.

Served By/s/ Richard P. Arthur

###